

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

SHANE LOPEZ,  
Defendant.

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)  
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)  
)

CR. NO. 1:21-CR- 223 .

(JUDGE Conner. )

(Electronically Filed)

INDICTMENT

FILED  
HARRISBURG, PA

AUG 04 2021

THE GRAND JURY CHARGES:

Per AAA  
Deputy Clerk

COUNT 1

(Distribution and Receipt of Images Containing  
the Sexual Exploitation of a Child)

Between on or about August 27, 2020 and on or about October 13,  
2020, in Dauphin County, within the Middle District of Pennsylvania,  
the defendant,

**SHANE LOPEZ,**

knowingly distributed and received child pornography, as defined in  
Title 18, United States Code, Section 2256(8)(A), using any means and  
facility of interstate and foreign commerce, including by computer and  
cellular telephone.

All in violation of Title 18, United States Code, Section  
2252A(a)(2) and (b)(1).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 2**

(Possession of Images Containing  
the Sexual Exploitation Children)

Between on or about August 27, 2020 and on or about October 13, 2020, in Dauphin County, within the Middle District of Pennsylvania, the defendant,

**SHANE LOPEZ,**

did knowingly possess child pornography, involving a prepubescent minor who had not attained 12 years of age, as defined in Title 18, United States Code, Section 2256(8)(A), which had been shipped and transported in and affecting interstate and foreign commerce, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, by any means, including by computer and cellular telephone.

All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 3**

(Sexual Exploitation of a Child)

On or about May 20, 2021, in Schuylkill County, within the  
Middle District of Pennsylvania, the defendant,

**SHANE LOPEZ,**

did employ, use, persuade, induce, entice, and coerce a minor, L.H., to  
engage in sexually explicit conduct for the purpose of producing a visual  
depiction of such conduct using materials that have been mailed,  
shipped, and transported in and affecting interstate and foreign  
commerce.

All in violation of Title 18, United States Code, Section 2251(a).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 4**

(Possession of Images Containing  
the Sexual Exploitation Children)

On or about May 20, 2021, in Schuylkill County, within the  
Middle District of Pennsylvania, the defendant,

**SHANE LOPEZ,**

did knowingly possess child pornography, involving a prepubescent  
minor who had not attained 12 years of age, as defined in Title 18,  
United States Code, Section 2256(8)(A), which had been shipped and  
transported in and affecting interstate and foreign commerce, and that  
was produced using materials that had been mailed, shipped and  
transported in and affecting interstate and foreign commerce, by any  
means, including by computer and cellular telephone.

All in violation of Title 18, United States Code, Section  
2252A(a)(5)(B).

**NOTICE OF FORFEITURE**

The allegations contained in Counts 1 through 4 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.

Upon conviction of any offense in violation of Title 18, United States Code, Sections 2252A(a)(2), (b)(1), and (a)(5)(B), and Title 18, United States Code, Section 2251(a), the defendant,

**SHANE LOPEZ,**

shall forfeit to the United States:

- a. any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;
- b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and
- c. any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, or any property traceable to such property.

The property to be forfeited to the United States includes, but is not limited to the following:

a. Samsung Galaxy Note 8, SM-N95OU,

IMEI: 351823091893909.

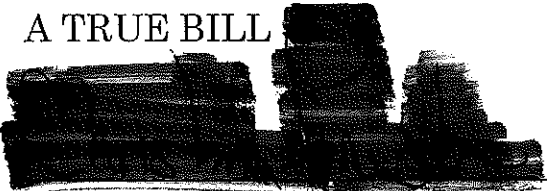
If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL

  
Foreperson, Grand Jury

BRUCE D. BRANDLER  
ACTING UNITED STATES ATTORNEY

  
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SCOTT R. FORD  
ASSISTANT U.S. ATTORNEY

Date: 8/4/21